

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

---

BRIAN BEMKE, SCOTT COLLETT,  
JOHN FERIOZZI, JUDY FINTZ, SARAH  
JAMIESON, EVAN JOHNSON, TRACY  
LONG, and CLIFFORD NEUMANN,

Plaintiffs,

v.

Case No. 21-cv-560

AMY PECHACEK, in her official capacity  
as Secretary-designee of the State of Wisconsin  
Department of Workforce Development,

Defendant.

---

**PLAINTIFFS' MOTION FOR THE APPOINTMENT OF GINGRAS, THOMSEN & WACHS, LLP, AXLEY  
BRYNELSON, LLP AND VICTOR FORBERGER, ESQ., AS CO-CLASS COUNSEL**

---

NOW COME the plaintiffs, by and through their undersigned counsel, and hereby move this Court pursuant to Fed. R. Civ. P. 23(g) for an order appointing Paul Kinne and Riley Leonard of Gingras, Thomsen & Wachs ("GTW"), Heath P. Straka of Axley Brynelson, LLP ("Axley"), and Victor Forberger of Victor Forberger, Esq., ("Forberger") as co-class counsel in this matter.

Filed concurrently in support of this motion are the following documents: (1) the Declaration of Paul A. Kinne in Support of Plaintiffs' Motion for Appointment of GTW, Axley and Forberger, as Co-Class Counsel; (2) the Declaration of Riley C. Leonard in Support of Plaintiffs' Motion for Appointment of GTW, Axley and Forberger, as Co-Class Counsel; (3) the Declaration of Heath P. Straka in Support of Plaintiffs' Motion for Appointment of GTW, Axley and Forberger, as Co-Class Counsel; and (4) the Declaration of Victor Forberger in Support of Plaintiffs' Motion for Appointment of GTW, Axley and Forberger, as Co-Class Counsel.

Submitted this 9<sup>th</sup> day of January, 2023.

GINGRAS, THOMSEN & WACHS, LLP

/s/ Paul A. Kinne

Paul A. Kinne (SBN: 1021493)

Riley C. Leonard (SBN: 1101452)

8150 Excelsior Drive

Madison, WI 53717

Tel: (608) 833-2632

[Kinne@gtwlawyers.com](mailto:Kinne@gtwlawyers.com)

[rleonard@gtwlawyers.com](mailto:rleonard@gtwlawyers.com)

VICTOR FORBERGER, ESQ.

/s/ Victor Forberger

Victor Forberger (SBN: 1070634)

2509 Van Hise Ave

Madison, WI 53705

Tel: (608) 352-0138

[Forberger@fastmail.fm](mailto:Forberger@fastmail.fm)

AXLEY BRYNELSON, LLP

/s/ Heath Straka

Heath Straka (SBN: 1031351)

2 E. Mifflin Street, Ste. 200

Madison, WI 53701

Tel: (608) 283-6755

[HStraka@axley.com](mailto:HStraka@axley.com)

***Attorneys for plaintiffs***